

EXHIBIT 3

1
2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK
4 GPIF-I EQUITY CO, LTD., and)
5)
6 Plaintiffs-Counterclaim)
7 Defendants,)
8)
9)
10 vs.) Case No.
11) 13 Civ 547 (CM)
12 HDG MANSUR INVESTMENT SERVICES,)
13 HDGM ADVISORY SERVICES, LLC,)
14 and HAROLD GARRISON,)
15)
16 Defendants-Counterclaim)
17 Plaintiffs,)
18 -----)
19 HDG MANSUR INVESTMENT SERVICES)
20 INC. and HDGM ADVISORY)
21 SERVICES, LLC,)
22)
23 Third-Party Plaintiffs,)
24)
25 vs.)
26)
27 HSBC SECURITIES (USA) INC.,)
28)
29 Third-Party Plaintiffs.)
30 -----)
31 CONFIDENTIAL
32 VIDEOTAPED DEPOSITION OF BRIAN REEVE
33 New York, New York
34 Thursday, November 21, 2013
35
36 Reported by:
37 FRANCIS X. FREDERICK, CSR, RPR, RMR
38 JOB NO. 67053

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1	B. REEVE - CONFIDENTIAL	1	B. REEVE - CONFIDENTIAL
2	marked Plaintiff's 17. It's an e-mail and	2	A. I believe Aaron Caperton.
3	attachment. The top e-mail is dated January	3	Q. Did you ask him to prepare it?
4	18, 2013.	4	A. No.
5	Do you recognize this e-mail and	5	Q. Do you know who did? 10:00
6	attachment? 09:58	6	A. I believe so.
7	(Document review.)	7	Q. Who do you believe asked him to
8	A. Yes.	8	prepare it?
9	Q. Starting with the cover e-mail,	9	A. PwC auditors.
10	the e-mail at the beginning of the chain, at	10	Q. Okay. When was this prepared? 10:00
11	09:59 the bottom of the front page from Mr. Garrison	11	A. I believe earlier in January.
12	to you dated January 27, 2013, he asked: "Do	12	Q. Okay.
13	you know the number of draws made against the	13	A. 2013.
14	finance fee in 2012? The first date, and last	14	Q. So it wasn't prepared
15	date?" 09:59	15	contemporaneous with the payments being made. 10:00
16	Do you know what prompted Mr.	16	A. Not that I'm aware of.
17	Garrison to ask for this information?	17	Q. Okay. And do you have an
18	A. No.	18	understanding of what PwC asked be scheduled?
19	Q. And then you say: "Here is the	19	A. I believe.
20	schedule." 09:59	20	Q. Okay. What? 10:01
21	And if we could look at the back	21	A. A list of the timing of the
22	side of the page there is, in fact, a	22	payments and the amounts within the general
23	schedule. Did you prepare this schedule?	23	ledger account. A specific general ledger
24	A. No.	24	account.
25	Q. Do you know who did? 10:00	25	Q. Okay. And when you say the timing 10:01
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1	B. REEVE - CONFIDENTIAL	1	B. REEVE - CONFIDENTIAL
2	of the payments, is this schedule all payments	2	contracts between the GPIF funds and the fund
3	of transaction fees made during 2012?	3	manager at the time the payments were made?
4	A. No.	4	MR. EARLEY: Objection to the form
5	Q. Okay. 10:01	5	of the question. 10:03
6	A. I don't believe so.	6	A. Can you repeat the question,
7	Q. What payments are scheduled here?	7	please?
8	A. The prepayments.	8	Q. Sure.
9	Q. Okay. So to make sure I	9	Do you have an understanding as to
10	understand, to the best of your understanding, 10:01	10	whether the fees on these properties were due 10:03
11	this schedule represents prepayments of	11	to be paid to the fund manager under the fund
12	transaction fees paid to the fund manager	12	management agreements at the time the payments
13	during 2012.	13	were made?
14	A. Yes.	14	MR. EARLEY: Objection to the form
15	Q. Okay. And what do you mean by	15	of the question. 10:03
16	prepayments? 10:02	16	A. Yes.
17	A. Payments on transactions to close	17	Q. What is your understanding?
18	in the future.	18	A. The contract allows for it.
19	Q. Okay. So these tran -- the	19	Q. Okay. And is that view based on
20	transactions connected with the properties	20	your own review of the contracts or is that 10:03
21	listed here had not happened at the time the	21	something someone told you?
22	fees were paid to the fund manager.	22	A. My own review.
23	A. Correct.	23	Q. And the dates on the document,
24	Q. Do you have an understanding of	24	what are those dates?
25	whether these fees were due under the	25	A. My understanding is the dates the 10:04